

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE:	§	
OUTLAW STEAKBURGERS, LLC	§	Case No. 25-60236
XX-XXX4540	§	
207 E Charnwood St	§	
Tyler, TX 75701	§	
Debtor	§	Chapter 11 – Subch. V

MOTION FOR AUTHORITY TO USE CASH COLLATERAL

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this Motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading **WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE** shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Outlaw Steakburgers, LLC (“Debtor”) and files this Motion for Authority to Use Cash Collateral pursuant to 11 U.S.C. § 363. The Debtor presents this Motion and respectfully represents the following:

1. On April 22, 2025 (“Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (“Bankruptcy Code”) and is now operating its business as a Debtor-In-Possession.
2. The Debtor continues to manage and operate its American fast-casual restaurant chains business as Debtor-In-Possession pursuant to §§1107 and 1108 of the Bankruptcy Code. No creditors’ committee has been appointed in this case by the United States Trustee.
3. The Debtor depends on the use of cash collateral for operations and purchase of additional raw materials, as well as payroll. Revenue is generated from their American fast-casual restaurant chains.

4. It is critical to the operation of the Debtor's business, and to its reorganization efforts, that it be permitted to pay expenses using cash collateral. The Debtor produces revenue from its use of the cash collateral by paying the budgeted expenses. Upon opening the new DIP account, all such revenue will be deposited by Debtor in its DIP operating account pending entry of an order allowing use of cash collateral or consent by lien holders.

5. Without the use of this Cash Collateral, the Debtor would likely have to cease operations and cause irreparable harm to the Debtor.

6. Attached as Exhibit "A" is a 14-day and 30-day budget for the Debtor, showing projected income and expenses. The amounts listed are reasonable and good faith estimations of what the Debtor needs to spend each month to continue the operations of its business and reorganize.

7. Debtor hereby requests authority to use the cash collateral for expenses set forth on Exhibit "A" and any other unforeseeable expenses that may arise and pose a threat to the Debtor's continued operations. Specifically, the Debtor requests authority to use the cash collateral to pay up to 110% of each expense in Exhibit A, so long as the total of cash collateral spent during the month does not exceed by more than 5% of that month's total in Exhibit "A."

8. A search in the Texas Secretary of State shows that allegedly secured positions are held by:

- a. Equity Bank; UCC Filing No. 21-0037914562(8/30/2021);
- b. Unknown Creditor (First Corporate Solutions); UCC Filing No. 23-0038905999(9/6/2023);
- c. Dedicated Funding LLC; UCC Filing No. 23-0040190130(9/12/2023);
- d. Unknown Creditor (Corporation Service Co.); UCC Filing No. 23-0050803920(11/30/2023)

See Exhibit "B" (UCC List).

9. The UCC's liens above appear to be blanket liens allegedly secured by current and future accounts receivables, inventory and equipment at Debtors' business.

10. In exchange for the use of cash collateral, the Debtor proposes to grant these entities be replacement liens to the same extent and priority, if any, that existed as of the date of filing. Debtor will continue to investigate the true nature of these transactions and work with these entities before a final cash collateral hearing to determine if anything other than replacement liens or additional adequate protection is necessary.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests this matter be set for hearing and that upon hearing, the Court will enter an Interim Order authorizing the Debtor's use of the cash collateral in the amounts set forth in Exhibit "A" and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

THE LANE LAW FIRM, PLLC

/s/Robert C. Lane

Robert C. Lane

State Bar No. 24046263

notifications@lanelaw.com

A. Zachary Casas

State Bar No. 24097469

6200 Savoy, Suite 1150

Houston, Texas 77036

(713) 595-8200 Voice

(713) 595-8201 Facsimile

PROPOSED COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Debtor's Motion for Authority to Use Cash Collateral was served upon the US Trustee and to the parties listed on the service list below and the attached mailing matrix either via electronic notice by the court's ECF noticing system and by was served upon the US Trustee and to the parties listed on the service list below by United States First Class Mail Postage Prepaid and by United States First Class Mail Postage Prepaid with overnight delivery(where stated), and by electronic mail as listed below on April 22, 2025:

Debtor:

Outlaw Steakburgers, LLC
207 E Charnwood St
Tyler, TX 75701

US Trustee:

Office of the U.S. Trustee:
110 N. College Avenue
Suite 300
Tyler, TX 75702

Additional Secured Parties in Interest (US First Class Mail Postage Prepaid Overnight Delivery):

Ally
PO BOX 380902
Bloomington, MN 55438

Bluevine
30 Montgomery St Ste 1400
Jersey City, NJ 07302-3857

Cardiff, Inc.
122 15th St Unit 2562
Del Mar, CA 92014-8082

Dedicated Funding LLC
860 East 4500 South Suite 312
Salt Lake City, UT 84107

Equity Bank
7701 E Kellogg Dr Ste 100
Wichita, KS 67207-1601

Texas Comptroller
111 E. 17th Street
Austin, TX 78774

Email Notification of Interested Parties:

bncmail@w-legal.com

support@bluevine.com

info@dedicatedfunding.com

bankruptcytax@oag.texas.gov

bankruptcysection@cpa.texas.gov

byakel@equitybank.com

/s/Robert C. Lane
Robert C. Lane

Label Matrix for local noticing

Ally Automotive Financing

Athens Burgers, LLC

0540-6

Attn Bankruptcy Dept

3636 N Causeway Blvd Ste 200

Case 25-60236

PO Box 380902

Metairie, LA 70002-7215

Eastern District of Texas

Minneapolis, MN 55438-0902

Tyler

Tue Apr 22 14:18:23 CDT 2025

Bimbos Bakeries USA

Bluevine

Cardiff, Inc.

Po Box 976

30 Montgomery St Ste 1400

122 15th St Unit 2562

Horsham, PA 19044-0976

Jersey City, NJ 07302-3857

Del Mar, CA 92014-8082

Cintas Corporation

(p)CREATIVE REALITIES INC

Daren Yeager

5355 W Sam Houston

ATTN ATTN CFO

207 E Charnwood St

Houston, TX 77041-5236

13100 MAGISTERIAL DRIVE

Tyler, TX 75701-1738

STE 100

LOUISVILLE KY 40223-5185

Daren Yeager

Dedicated Funding LLC

Dorsey Development, LLC

207 E Charnwood St

860 East 4500 South Suite 312

AttnL G. Paul Dorsey, III

Tyler, TX 75701-1738

Salt Lake City, UT 84107-3152

3636 N Causeway Blvd Ste 200

Metairie, LA 70002-7215

Ecolab

Edwards Plumbing Inc.

Edwards Plumbing Inc.

1 Ecolab Pl

3708 E Rio Grande St

PO Box 7244

Saint Paul, MN 55102-2739

Victoria, TX 77901-1625

Victoria, TX 77903-7244

Elite Mechanical Services of North Texas, LL

Equity Bank

(p)EQUITY BANK

231 Jacinth Ln

7001 E Kellogg Dr Ste 100

BRETT REBER GENERAL COUNSEL

Granbury, TX 76049-7796

Wichita, KS 67207-1601

7701 E KELLOGG DRIVE SUITE 300

WICHITA KS 67207-1708

Freddy?s Corporate

Greenville Burgers, LLC

Inspira Financial Trust, LLC

260 N Rock Rd Ste 200

3636 N Causeway Blvd Ste 200

Custodian FBO Kevin Brannon IRA #2807611

Wichita, KS 67206-2285

Metairie, LA 70002-7215

2001 Spring Rd Suite 700

Oak Brook, IL 60523-1890

JKLM Investments LLC

James Buchinger

Jason Jones

Po Box 1104

13559 Peninsula Rd

4261 E University Dr # 30351

Woodsboro, TX 78393-1104

Whitehouse, TX 75791-8315

Prosper, TX 75078-3645

KAVU-TV

KMOL-TV

KVCT-TV

3808 N Navarro St

3808 N Navarro St

3808 N Navarro St

Victoria, TX 77901-2684

Victoria, TX 77901-2621

Victoria, TX 77901-2621

KXTS-TV

Lamar Companies

Robert C. Lane

3808 N Navarro St

695 US-46 210

The Lane Law Firm PLLC

Victoria, TX 77901-2621

Fairfield, NJ 07004

6200 Savoy Dr Ste 1150

Houston, TX 77036-3369

MVCT-TV
Po Box 840451
Dallas, TX 75284-0451

North Texas REI, LLC
4261 E University Dr Ste 30351
Prosper, TX 75078-3645

Outlaw Steakburgers Athens LLC
4261 E University Dr Ste 30351
Suite 1150
4261 University Blvd Ste 30351 Suite 115
Houston, TX 77005

Outlaw Steakburgers Victoria, LLC
4261 University Blvd Ste 30351 Ste 1150
Houston, TX 77005

Outlaw Steakburgers, LLC
207 E Charnwood St
Tyler, TX 75701-1738

Outlaw Steakburgers, LLC
7001 I-30 Frontage Road
Greenville, TX 75402

Ralston Outdoor Advertising
2220 Shorecrest Dr
Dallas, TX 75235-1802

Restaurant Technologies, Inc
2250 Pilot Knob Rd Ste 100
Saint Paul, MN 55120-1127

Ronald Lucich, Jr
4261 University Blvd Ste 30351 Suite 115
Houston, TX 77005

(p)SIMMONS BANK
POST OFFICE BOX 733
UNION CITY TN 38281-0733

Tax Assesor Collector Collin County
Po Box 8046
Mckinney, TX 75070-8046

Texas Capital Bank
Attn: Consumer Operations
1001 E Lookout Dr, Tower A Ste 700
Richardson, TX 75082-4175

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

The Lane Law Firm
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

Townsquare Media Victoria
107 N Star Dr
Victoria, TX 77904-2082

TriMark
Po Box 6939
Carol Stream, IL 60197-6939

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231

Ventura Tarzana LLC
2620 S Maryland Pkwy # 14-355
Las Vegas, NV 89109-8300

Vestis
10110 Cash Rd
Stafford, TX 77477-4409

Victoria Burgers, LLC
Attn: G. Paul Dorsey, III
3636 N Causeway Blvd Ste 200
Metairie, LA 70002-7215

Victoria County Tax Assesor - Collector
Attn: Ashley Hernandez
Po Box 2569
Victoria, TX 77902-2569

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Creative Realities, Inc.
13100 Magisterial Dr Ste 100
Louisville, KY 40223-5185

Equity Bank
7701 E Kellogg Dr Ste 100
Wichita, KS 67207-1601

Simmons First National Bank
PO Box 7009
Pine Bluff, AR 71611

Texas Comptroller
111 E. 17th Street
Austin, TX 78774

End of Label Matrix	51
Mailable recipients	51
Bypassed recipients	0
Total	51